IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

DATATREASURY CORP.,	§	CIVIL ACTION NO.
Plaintiff	§	2:04-CV-85
	§	Hon. David J. Folsom
vs.	§	
	§	
SMALL VALUE PAYMENTS	§	
COMPANY	§	
Defendant	§	

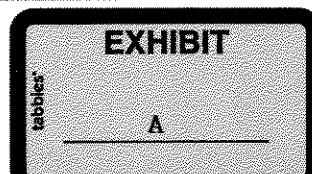### <u>Plaintiff's Preliminary Infringement Contentions</u>

Plaintiff DataTreasury Corp. ("DataTreasury") makes its Preliminary

Infringement Contentions, and would show as follows:

Claim 1	
Claim Language	**Accused Instrumentality**
1. A system for central management, storage and report generation of remotely captured paper transactions from documents and receipts comprising:	SVPCo Image Exchange
one or more remote data access subsystems for capturing and sending paper transaction data and subsystem identification information comprising at least one imaging subsystem for capturing the documents and receipts and at least one data access controller for managing the capturing and sending of the transaction data;	Clients of SVPCo are required to capture their paper transaction data into electronic images to be sent to SVPCo Image Exchange system. The document titled "Agent for Change" by Karl Pezirtz published on January 2004 found on the website http://www.bankersonline.com/ vendor_guru/vector/vector_agent.html states- "The DTA is particularly well-suited to banks that have already implemented image capture and back office systems" The document titled "SVPCo's Distributed Traffic Agent" by Karl Pezirtz first published on 02/16/04 on the website http://www.bankersonline.com/vendor_guru/

	vector/vector_cmp021604a.html states-"For banks that aren't quite as far along in image capabilities, VECTORsgi can supply any necessary software for the creation and receipt of image exchange files."
at least one central data processing subsystem for processing, sending, verifying and storing the paper transaction data and the subsystem identification information comprising a management subsystem for managing the processing, sending and storing of the transaction data; and	SVPCo Image Exchange network as diagrammed or mentioned in the following articles found at http://www.svpco.com/ie_network.pdf, http://www.bai.org/check21/pdf/Farrar-Kline.pdf, and http://www.bankersonline.com/ vendor_guru/vector/vector_cmp021604a.html shows that there must exist a central data processing subsystem for the following elements: 1)Processing: this is stated in the diagrams 2)Sending: Images are being sent to and from the SVPCo Image Exchange system. 3)Verifying: Images that are sent requires verification of all the information about all the files sent from one bank to another which allows any bank to access the system to check the status of files they have sent or files sent to them. This is one of the functions of SVPCo's Distributed Traffic Agent (DTA). 4) Storing of the transaction data- SVPCo has all the information about all the files sent from one bank to another, any bank can access the system to check the status of files they have sent or files sent to them. In addition, transaction data must exist since it is claimed in the article that banks can use the DTA for network communications, authentication, file tracking and audit controls. In essence, the DTA is a specialized local controller that acts as a gateway between nodes on the interbank exchange network managed by Electronic Clearing Services (ECS), the SVPCo operating subsidiary that runs the ECP and image systems

| at least one communication network for the transmission of the transaction data within and between said one or more data access subsystems and said at least one data processing subsystem, with the data access subsystem providing encrypted subsystem identification information and encrypted paper transaction data to the data processing subsystem. | SVPCo Image Exchange system network architecture diagram found at http://www.svpco.com/ie_network.pdf shows that the Distributed Traffic Agent operates on a communication network which employs the networking protocol TCP/IP. Images are transferred into SVPCo Image Exchange system and then transferred between financial institutions using hypertext transfer protocol (HTTP) or file transfer protocol (FTP). The transmission of image is encrypted using internet protocol security (IPSec). |

Claim 2

Claim Language	Accused Instrumentality
2. A system as in claim 1 wherein said one or more data access subsystems further comprise at least one scanner for capturing the paper transaction data.	Digital images of paper transaction data in SVPCo's Image Exchange System were created using scanner devices.

Claim 3

Claim Language	Accused Instrumentality
3. A system as in claim 2 wherein said one or more data access subsystems also capture electronic transactions from credit cards, smart cards and debit cards, signature data or biometric data, further comprising:	SVPCo Image Exchange system would require that clients capture electronic transactions. Financial institutions would have a system that captures electronic transactions to transfer to SVPCo Image Exchange system.
at least one card interface for capturing the electronic transaction data;	SVPCo clients
at least one signature interface for capturing an electronic signature; and	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
at least one biometric interface for capturing biometric data.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 4	
Claim Language	**Accused Instrumentality**
4. A system as in claim 3 wherein said at least one data access controller successively transforms the captured transaction data to a bitmap image, a compressed bitmap image, an encrypted, compressed bitmap image and an encrypted, compressed bitmap image tagged with information identifying a location and time of the transaction data capture.	Industry standards would dictate that images are in bitmap format. Further discovery will show that the images are encrypted ,compressed bitmap images and an encrypted, compressed bitmap images tagged with information with identification.

Claim 5	
Claim Language	**Accused Instrumentality**
5. A system as in claim 4 wherein said one or more data access subsystems further comprise digital storage for storing the tagged, encrypted, compressed bitmap image.	SVPCo Image Exchange system receives, stores, and transfers bitmap images transferred by clients.

Claim 6	
Claim Language	**Accused Instrumentality**
6. A system as in claim 5 wherein said at least one card interface initiates the electronic transaction.	SVPCo Image Exchange system receives transmission of images which is initiated by the client's system.

Claim 7	
Claim Language	**Accused Instrumentality**
7. A system as in claim 6 wherein said one or more data access subsystems further comprise at least one printer for printing the paper transaction initiated by said at least one card interface.	The press release dated 09/29/2004 found on http://www.vectorsig.com/Media /vectorsig09292004.asp claims to have the capability to execute reports of summary information. In addition, SVPCo Image Exchange system supports IRD printing.

Claim 8	
Claim Language	**Accused Instrumentality**
8. A system as in claim 7 wherein the paper transaction printed by said at least one printer includes data glyphs	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 9

Claim Language	Accused Instrumentality
9. A system as in claim 1 wherein said data management subsystem of said at least one data processing subsystem comprises:	SVPCo Image Exchange System
at least one server for polling said one or more remote data access subsystems for transaction data;	More than one server is diagrammed in the SVPCo Image Exchange system network architecture diagram found at http://www.svpco.com/ie_network.pdf. MQSeries, which is a component of the network architecture, polls for transmittal and notification messages of transaction data.
a database subsystem for storing the transaction data in a useful form;	Deduction can be made and further discovery will show that at least one database is present and essential to store transaction data in a useful form. Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
a report generator for generating reports from the transaction data and providing data to software applications;	The press release dated 09/29/2004 found on http://www.vectorsig.com/Media/vectorsig09292004.asp claims to have the capability to execute reports of summary information. In addition, SVPCo Image Exchange system supports IRD printing. SVPCo Image Exchange system allows for web-enabled management tool for reporting and tracking.
at least one central processing unit for managing the storing of the transaction data;	Deduction can be made and further discovery will show that SVPCo Image Exchange system comprise of at least one central processing unit for managing the storing of transaction data. Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

| a domain name services program for dynamically assigning one of said at least one server to receive portions of the transaction data for balancing the transaction data among said at least one server; and | SVPCo Image Exchange system contains a network comprising of web servers and since a large number of images are accessed through the Checkview web server by many banking institutions, deduction can be made that there are domain name services program to assign transaction data across other servers for purpose of load balancing.

Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions. |
| a memory hierarchy. | Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions. |

Claim 10

Claim Language	Accused Instrumentality
10. A system as in claim 9 wherein said at least one server also polls for biometric and signature data, said database stores the biometric data and the signature data, and said at least one central processing unit verifies the biometric data and the signature data.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 11

Claim Language	Accused Instrumentality
11. A system as in claim 9 wherein said memory hierarchy comprises at least one primary memory for storage of recently accessed transaction data and at least one secondary memory for storage of other transaction data.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 12

Claim Language	Accused Instrumentality
12. A system as in claim 11 wherein said at least one secondary memory comprises at least one write once read many jukebox and at least one optical storage jukebox.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 13

Claim Language	Accused Instrumentality
13. A system as in claim 12 wherein said at least one optical storage jukebox comprises read only memory technology including compact disc read only memory form factor metallic write once read many disc.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 14

Claim Language	Accused Instrumentality
14. A system as in claim 9 wherein said database subsystem comprises at least one predefined template for partitioning the stored transaction data into panels and identifying locations of the panels.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 15

Claim Language	Accused Instrumentality
15. A system as in claim 14 wherein said data processing subsystem further comprises a data entry gateway for correcting errors in the panels of stored transaction data.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 16

Claim Language	Accused Instrumentality
16. A system as in claim 1 wherein said at least one communication network comprises:	SVPCo Image Exchange system.
at least one first local area network for transmitting data within a corresponding one of said one or more remote data access subsystems;	SVPCo Image Exchange system network architecture diagram found at http://www.svpco.com/ie_network.pdf shows a

	private network transferring images to banking institution networks through DTA.
at least one second local area network for transmitting data within a corresponding one of said at least one data processing subsystem; and	SVPCo Image Exchange system network architecture diagram found at http://www.svpco.com/ie_network.pdf shows a Checkview web server which transmits images between SVPCo private network and banking institution networks.
at least one wide area network for transmitting data between said one or more remote data access subsystems and said at least one data processing subsystem.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 17

Claim Language	Accused Instrumentality
17. A system as in claim 16 wherein said at least one communication network further comprises:	SVPCo Image Exchange System.
at least one modem for connecting said at least one first local area network of said one or more data access subsystems to a corresponding one of said at least one second local area network of said at least one data processing subsystem through said at least one wide area network; and	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
at least one bank of modems for connecting said at least one second local area network of said at least one data processing subsystem to a corresponding some of said at least one first local area network of said one or more data access subsystems through said at least one wide area network.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 18

Claim Language	Accused Instrumentality
18. A system as in claim 1 further comprising at least one data collecting subsystem for collecting and sending the electronic or paper transaction data comprising a further management subsystem for managing the collecting and sending of the transaction data.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 19	
Claim Language	**Accused Instrumentality**
19. A system as in claim 18 wherein said further data management subsystem of said at least one data collecting subsystem comprises:	SVPCo Image Exchange system
at least one server for polling said one or more remote data access subsystems for transaction data;	The SVPCo Image Exchange system network architecture diagram found at http://www.svpco.com/ie_network.pdf. MQSeries, which is a component of the network architecture, polls for transmittal and notification messages of transaction data.
a database for storing the transaction data in a useful form;	The article titled "Image Is Everything" published by Network World on 09/01/03 written by Peter Ruber states that the distributed traffic agent (DTC) server uses Microsoft's database management system SQL Server.
at least one central processing unit for managing the collecting of the transaction data;	Transaction data from financial institution is transferred to, collected, and managed by the SVPCo Image Exchange system.
a domain name services program for dynamically assigning one of said at least one server to receive portions of the transaction data for balancing the transaction data among said at least one server; and	SVPCo Image Exchange system network architecture diagram found at http://www.svpco.com/ie_network.pdf shows a web server by which a customer access via the internet using a web browser. Since there exist at least one web server, deduction can be made that a domain name services (DNS) program is used in the network; and due to the vast amounts of images that are transferred to and from the SVPCo Image Exchange system, a DNS program is needed to assign designation of network traffic for load balancing purposes.

Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions. |
| a memory hierarchy. | Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions. |

Claim 20	
Claim Language	**Accused Instrumentality**
20. A system as in claim 19 wherein said memory hierarchy comprises at least one primary memory for collecting transaction data and at least one secondary memory for backup storage of the transaction data.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 21	
Claim Language	**Accused Instrumentality**
21. A system as in claim 20 wherein said at least one secondary memory comprises at least one DLT jukebox.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 22	
Claim Language	**Accused Instrumentality**
22. A system as in claim 18 wherein said at least one communication network comprises:	SVPCo Image Exchange system.
at least one first local area network for transmitting data within a corresponding one of said one or more remote data access subsystems;	SVPCo Image Exchange system private network transfer images to the networks of remote banks that requests images.
at least one second local area network for transmitting data within a corresponding one of said at least one data collection subsystem;	Deduction can be made that SVPCo Image Exchange system contains at least one second local area network for transmitting data within a corresponding one of said at least one data collection subsystem. Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
at least one third local area network for transmitting data within a corresponding one of said at least one data processing subsystem; and	Deduction can be made that SVPCo Image Exchange system contains at least one third local area network for transmitting data within a corresponding one of said at least one data collection subsystem. Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will

	amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
at least one wide area network for transmitting data between said one or more remote data access subsystems, said at least one data collection subsystem and said at least one data processing subsystem.	Deduction can be made that SVPCo Image Exchange system contains at least one wide area network for transmitting data within a corresponding one of said at least one data collection subsystem. Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 23

Claim Language	Accused Instrumentality
23. A system as in claim 22 wherein said at least one communication network further comprises:	
at least one first modem for connecting said at least one first local area network of said one or more data access subsystems to a corresponding one of said at least one second local area network through said at least one wide area network;	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
at least one bank of modems for connecting said at least one second local area network of said at least one data collection subsystem to a corresponding some of said at least one first local area network of said one or more data access subsystems through said at least one wide area network;	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
at least one first wide area network router for connecting a corresponding one of said at least one second local area network of said at least one data collecting subsystem to said at least one wide area network; and	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
at least one second wide area network router for connecting a corresponding one of said at least one third local area network of said at least one data processing subsystem to said at least one wide area network.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 24	
Claim Language	**Accused Instrumentality**
24. A system as in claim 23 wherein said at least one first wide area network and said at least one second wide area network comprises a carrier cloud, said carrier cloud using a frame relay method for transmitting the transaction data.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 25	
Claim Language	**Accused Instrumentality**
25. A system as in claim 22 wherein said at least one second local area network and said at least one third local area network further comprises a corresponding one of at least one network switch for routing transaction data within said at least one second local area network and said at least one third local area network.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 26	
Claim Language	**Accused Instrumentality**
26. A method for central management, storage and verification of remotely captured paper transactions from documents and receipts comprising the steps of:	SVPCo Image Exchange system.
capturing an image of the paper transaction data at one or more remote locations and sending a captured image of the paper transaction data;	Clients of SVPCo are required to capture their paper transaction data into electronic images to be sent to SVPCo Image Exchange system. The key component of SVPCo Image Exchange system is the Distributed Traffic Agent (DTA) The document titled "Agent for Change" by Karl Pezirtz published on January 2004 found on the website http://www.bankersonline.com/ vendor_guru/vector/vector_agent.html states- "The DTA is particularly well-suited to banks that have already implemented image capture…" Clients of SVPCo are required to capture their paper transaction data into electronic images to be sent to SVPCo Image Exchange system. SVPCo Image Exchange system receives the transaction data from clients.

managing the capturing and sending of the transaction data;	Clients of SVPCo are required to capture their paper transaction data into electronic images to be sent to SVPCo Image Exchange system. SVPCo Image Exchange system receives the transaction data from clients.
collecting, processing, sending and storing the transaction data at a central location;	SVPCo Image Exchange system network architecture diagram found at http://www.svpco.com/ie_network.pdf shows that there exist a central location for: 1)Collecting: The MQSeries, a component of the SVPCo Image Exchange system collects images by "pulling" image payloads into the system. 2)Processing: Stated in the diagram. 3)Sending: Images are being sent to and from the SVPCo Image Exchange system. Images that are sent requires verification of all the information about all the files sent from one bank to another which allows any bank to access the system to check the status of files they have sent or files sent to them. This is one of the functions of SVPCo's Distributed Traffic Agent (DAT). This reference can be found at http://www.bankersonline.com/vendor_guru/vector/vector_cmp021604a.html.
managing the collecting, processing, sending and storing of the transaction data;	In essence, the DTA is a specialized local controller that acts as a gateway between nodes on the interbank exchange network managed by Electronic Clearing Services (ECS), the SVPCo operating subsidiary that runs the ECP and image systems
encrypting subsystem identification information and the transaction data; and	The network architecture diagram found at http://www.svpco.com/ie_network.pdf states that Internet Protocol Security (IPSec) is used to encrypt transactions.
transmitting the transaction data and the subsystem identification information within and between the remote location(s) and the central location.	SVPCo Image Exchange system network architecture diagram found at http://www.svpco.com/ie_network.pdf shows that transaction data in form of transmission messages are push and pulled using the MQSeries component of the system architecture.

Claim 27	
Claim Language	**Accused Instrumentality**
27. The method as in claim 26 wherein said managing the capturing and sending step comprises the steps of:	SVPCo Image Exchange system.
successively transforming the captured transaction data to a bitmap image, a compressed bitmap image, an encrypted, compressed bitmap image and an encrypted, compressed bitmap image tagged with information identifying a location and time of the transaction data capturing; and	Industry standards would dictate that captured transaction data is transformed to bitmap images in the scanning process.
storing the tagged, encrypted, compressed bitmap image.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 28	
Claim Language	**Accused Instrumentality**
28. The method as in claim 27 wherein said managing the capturing and sending step also captures electronic transactions from credit cards, smart cards and debit cards, signature data or biometric data, further comprising the steps of:	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
initiating an electronic transaction;	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
capturing signature data;	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
capturing biometric data; and	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
printing a paper transaction with data glyphs for the initiated electronic transaction.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during

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	completion of its Final Infringement Contentions.

Claim 29

Claim Language	Accused Instrumentality
29. A method as in claim 26 wherein:	
said capturing and sending step occurs at a plurality of remote locations; and	SVPCo Image Exchange system main function is to capture and send images to remote financial branches.
said collecting, processing, sending and storing step occurs at a plurality of central locations.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 30

Claim Language	Accused Instrumentality
30. A method as in claim 29 wherein said collecting, processing, sending and storing step comprises the steps of:	
polling the remote locations for transaction data with servers at the central locations;	The SVPCo Image Exchange system network architecture diagram found at http://www.svpco.com/ie_network.pdf. MQSeries, which is a component of the network architecture, polls for transmittal and notification messages of transaction data.
storing the transaction data at the central location in a memory hierarchy, said storing maintains recently accessed transaction data in a primary memory and other transaction data in a secondary memory; and	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
dynamically assigning the servers at the central location to receive portions of the transaction data for balancing the transaction data among the servers; and	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
generating reports from the transaction data and providing data to software applications.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 31

Claim Language	Accused Instrumentality
31. A method as in claim 30 wherein said storing the transaction data step comprises the steps of:	
partitioning the stored transaction data with predefined templates into panels; and	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
identifying locations of the panels.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 32

Claim Language	Accused Instrumentality
32. A method as in claim 31 wherein said managing the collecting, processing, sending and storing of the transaction data step comprises correcting errors in the panels of stored transaction data.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 33

Claim Language	Accused Instrumentality
33. A method as in claim 32 further comprising the steps of:	
polling the remote locations for captured electronic data, captured signature data and captured biometric data with servers at the central locations; and	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
comparing the captured signature data and the captured biometric data to stored signature data and stored biometric data respectively for identification verification.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 34

Claim Language	Accused Instrumentality
34. A method as in claim 32 wherein said transmitting the transaction data step comprises the steps of:	

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transmitting data within the remote locations;	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
transmitting data from each remote location to a corresponding central location; and	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
transmitting data within the central locations.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 35

Claim Language	Accused Instrumentality
35. A method as in claim 34 wherein said transmitting data from each remote location to a corresponding central location step comprises the steps of:	
connecting each remote location to a corresponding central location; and	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
connecting each central location to corresponding remote locations.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 36

Claim Language	Accused Instrumentality
36. A method as in claim 29 further comprising the steps of:	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
collecting and sending the electronic or paper transaction data at intermediate locations;	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

managing the collecting and sending of the transaction data; and	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
transmitting the transaction data within the intermediate location and between the intermediate locations and the remote locations and the central locations.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 37

Claim Language	Accused Instrumentality
37. A method as in claim 36 wherein said managing the collecting and sending step comprises the steps of:	
polling the remote locations for transaction data with servers in the intermediate locations;	DataTreasury currently does not have enough information to show infringement. Infringement will be show through discovery.
storing the transaction data in the intermediate locations in a useful form, said storing maintains the transaction data in a primary memory of a memory hierarchy and performs backup storage of the transaction data into a secondary memory of the memory hierarchy; and	DataTreasury currently does not have enough information to show infringement. Infringement will be show through discovery.
dynamically assigning the servers to receive portions of the transaction data for balancing the transaction data among the servers.	DataTreasury currently does not have enough information to show infringement. Infringement will be show through discovery.

Claim 38

Claim Language	Accused Instrumentality
38. The method as in claim 36 wherein said transmitting the transaction data step comprises the steps of:	
transmitting data within the remote locations;	DataTreasury currently does not have enough information to show infringement. Infringement will be show through discovery.
transmitting data from each remote location to a corresponding intermediate location;	DataTreasury currently does not have enough information to show infringement. Infringement will be show through discovery.
transmitting data within the intermediate locations;	DataTreasury currently does not have enough information to show infringement. Infringement will be show through discovery.

| transmitting data from each intermediate location to corresponding central locations; and | DataTreasury currently does not have enough information to show infringement. Infringement will be show through discovery. |
| transmitting data within the central locations. | DataTreasury currently does not have enough information to show infringement. Infringement will be show through discovery. |

Claim 39

Claim Language	Accused Instrumentality
39. A method as in claim 38 wherein said transmitting data from each remote location to corresponding intermediate locations step comprises the steps of:	
connecting each remote location to a corresponding intermediate location; and	DataTreasury currently does not have enough information to show infringement. Infringement will be show through discovery.
connecting the intermediate locations to corresponding remote locations.	DataTreasury currently does not have enough information to show infringement. Infringement will be show through discovery.

Claim 40

Claim Language	Accused Instrumentality
40. A method as in claim 38 wherein said transmitting data from each intermediate location to corresponding central locations comprises the steps of:	
connecting each intermediate location to an external communication network; and	DataTreasury currently does not have enough information to show infringement. Infringement will be show through discovery.
connecting the corresponding central locations to the communication network.	DataTreasury currently does not have enough information to show infringement. Infringement will be show through discovery.

Claim 41

Claim Language	Accused Instrumentality
41. A method as in claim 40 wherein said transmitting data from each intermediate location to corresponding central locations step further comprises the steps of:	
packaging the transaction data into frames; and	DataTreasury currently does not have enough information to show infringement. Infringement will be show through discovery.
transmitting the frames through the external communication network.	DataTreasury currently does not have enough information to show infringement. Infringement will be show through discovery.

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Claim 42	
Claim Language	**Accused Instrumentality**
42. A communication network for the transmission of data within and between one or more remote data processing subsystems, at least one intermediate data collecting subsystem and at least one central subsystem forming a tiered architecture wherein each of said at least one central data processing subsystem communicate with a corresponding some of said at least one data collecting subsystem and each of said at least one data collecting subsystem communicate with a corresponding some of said one or more data processing subsystems, said data processing subsystem including an imaging subsystem for capturing images of documents and receipts, comprising:	SVPCo Image Exchange system network architecture diagram found at http://www.svpco.com/ie_network.pdf show multi-directional tiered communication between remote data processing subsystem (Bank A & Bank B) and the intermediate data collection subsystem (SVPCo Host). The intermediate data collection subsystem communicates with central data processing subsystem (SVPCo Private Network).
at least one first local area network for transmitting data within a corresponding one of said one or more remote subsystems;	SVPCo Image Exchange system network architecture diagram found at http://www.svpco.com/ie_network.pdf show a local area network transmit data with remote subsystems (Bank A & Bank B)
at least one second local area network for transmitting data within a corresponding one of said at least one intermediate subsystem;	Deduction can be made and further discovery will show there exist at least one second local area network for transmitting data within on intermediate subsystem. Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
at least one third local area network for transmitting data within a corresponding one of said at least one central subsystem; and	Deduction can be made and further discovery will show there exist at least one second local area network for transmitting data within one intermediate subsystem. Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

at least one wide area network for transmitting data between said one or more remote subsystems, said at least one intermediate subsystem and said at least one central subsystem.	Deduction can be made and further discovery will show there exist at least one wide area network for transmitting data between one or more remote systems, at least one intermediate subsystem and at least one central subsystem. Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 43

Claim Language	Accused Instrumentality
43. A communication network as in claim 42 further comprising:	
at least one first modem for connecting said at least one first local area network of said one or more remote subsystems to a corresponding one of said at least one second local area network through said at least one wide area network;	DataTreasury currently does not have enough information to show infringement. Infringement will be show through discovery.
at least one bank of modems for connecting said at least one second local area network of said at least one intermediate subsystem to a corresponding some of said at least one first local area network of said one or more remote subsystems through said at least one wide area network;	DataTreasury currently does not have enough information to show infringement. Infringement will be show through discovery.
at least one first wide area network router for connecting a corresponding one of said at least one second local area network of said at least one intermediate subsystem to said at least one wide area network; and	DataTreasury currently does not have enough information to show infringement. Infringement will be show through discovery.
at least one second wide area network router for connecting a corresponding one of said at least one third local area network of said at least one central subsystem to said at least one wide area network.	DataTreasury currently does not have enough information to show infringement. Infringement will be show through discovery.

Claim 44

Claim Language	Accused Instrumentality
44. A system as in claim 43 wherein said at least one first wide area network and said at least one second wide area network comprises a carrier cloud which utilizes a frame relay method for transmitting the transaction data.	DataTreasury currently does not have enough information to show infringement. Infringement will be show through discovery.

Claim 45

Claim Language	Accused Instrumentality
45. A system as in claim 44 wherein said at least one second local area network and said at least one third local area network further comprises a corresponding one of at least one network switch for routing transaction data within said at least one second local area network and said at least one third local area network; and further wherein said data comprises (a) electronic transactions from credit cards, smart cards and debit cards, signature data or biometric data, or (b) paper transactions from documents and receipts.	DataTreasury currently does not have enough information to show infringement. Infringement will be show through discovery.

Claim 46

Claim Language	Accused Instrumentality
46. A method for transmitting data within and between one or more remote subsystems, at least one intermediate subsystem and at least one central subsystem in a tiered manner wherein each of the central subsystems communicate with at least one intermediate subsystem and each of the intermediate subsystems communicate with at least one remote subsystems comprising the steps of:	SVPCo Image Exchange system network architecture diagram found at http://www.svpco.com/ie_network.pdf shows that there exist subsystems that are remote from each other communicating a tiered manner.
capturing an image of documents and receipts and extracting data there from;	SVPCo customers are required to capture images of documents be sent to SVPCo Image Exchange system.
transmitting data within the remote locations;	Deduction can be made that SVPCo customers transmit data within their company's network. Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

transmitting data from each remote location to corresponding intermediate location;	SVPCo Image Exchange system network architecture diagram found at http://www.svpco.com/ie_network.pdf indicates data from remote customer locations transferred to SVPCo network.
transmitting data within the intermediate locations;	Deduction can be made and further discovery will show that SVPCo Image Exchange network has multiple servers where data is transmitted from one server to another. Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
transmitting data from each intermediate location to corresponding central locations; and	SVPCo Image Exchange system network architecture diagram found at http://www.svpco.com/ie_network.pdf shows that data is transferred from an intermediate to corresponding central location.
transmitting data within the central locations.	Deduction can be made and further discovery will show that SVPCo transmits data within their central locations. Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 47

Claim Language	Accused Instrumentality
47. A method as in claim 46 wherein said transmitting data from each remote location to corresponding intermediate locations step comprises the steps of:	
connecting each remote location to a corresponding intermediate location; and	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
connecting the intermediate locations to corresponding remote locations.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will

	amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
Claim 48	

Claim Language	**Accused Instrumentality**
48. A method as in claim 47 wherein said transmitting data from each intermediate location to corresponding central locations comprises the steps of:	
connecting each intermediate location to an external communication network; and	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
connecting the corresponding central locations to the external communication network.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
Claim 49	

Claim Language	**Accused Instrumentality**
49. A method as in claim 48 wherein said transmitting data from each intermediate location to corresponding central locations step further comprises the steps of:	
packaging the transaction data into frames; and	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
transmitting the frames through the external communication network.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
Claim 50	

Claim Language	**Accused Instrumentality**
50. A method as in claim 46 wherein said data is obtained from (a) electronic transactions from credit	

cards, smart cards and debit cards, signature data or biometric data, or (b) paper transactions from documents and receipts.	

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Claim 1	
Claim Language	**Accused Instrumentality**
1. A system for central management, storage and report generation of remotely captured paper transactions from checks comprising:	SVPCo Image Exchange
one or more remote data access subsystems for capturing and sending paper transaction data including a payer bank's routing number, a payer bank's routing information, a payer's account number, a payer's check, a payer bank's draft, a check amount, a payee bank's identification number, a payee bank's routing information, and a payee's account number, and further including subsystem identification information comprising at least one imaging subsystem for capturing the checks and at least one data access controller for managing the capturing and sending of the transaction data;	Clients of SVPCo are required to capture their paper transaction data into electronic images to be sent to SVPCo Image Exchange system. The document titled "Agent for Change" by Karl Pezirtz published on January 2004 found on the website http://www.bankersonline.com/ vendor_guru/vector/vector_agent.html states- "The DTA is particularly well-suited to banks that have already implemented image capture and back office systems" The document titled "SVPCo's Distributed Traffic Agent" by Karl Pezirtz first published on 02/16/04 on the website http://www.bankersonline.com/vendor_guru/ vector/vector_cmp021604a.html states-"For banks that aren't quite as far along in image capabilities, VECTORsgi can supply any necessary software for the creation and receipt of image exchange files."

at least one central data processing subsystem for processing, sending, verifying and storing the paper transaction data and the subsystem identification information comprising a data management subsystem for managing the processing, sending and storing of the transaction data; and	SVPCo Image Exchange network as diagrammed or mentioned in the following articles found at http://www.svpco.com/ie_network.pdf, http://www.bai.org/check21/pdf/Farrar-Kline.pdf, and http://www.bankersonline.com/ vendor_guru/vector/vector_cmp021604a.html shows that there must exist a central data processing subsystem for the following elements: 1)Processing: this is stated in the diagrams 2)Sending: Images are being sent to and from the SVPCo Image Exchange system. 3)Verifying: Images that are sent requires verification of all the information about all the files sent from one bank to another which allows any bank to access the system to check the status of files they have sent or files sent to them. This is one of the functions of SVPCo's Distributed Traffic Agent (DTA). 4) Storing of the transaction data- SVPCo has all the information about all the files sent from one bank to another, any bank can access the system to check the status of files they have sent or files sent to them. In addition, transaction data must exist since it is claimed in the article that banks can use the DTA for network communications, authentication, file tracking and audit controls. In essence, the DTA is a specialized local controller that acts as a gateway between nodes on the interbank exchange network managed by Electronic Clearing Services (ECS), the SVPCo operating subsidiary that runs the ECP and image systems
at least one communication network for the transmission of the transaction data within and between said one or more data access subsystems and said at least one data processing subsystem, with the data access subsystem providing encrypted subsystem identification information and encrypted paper transaction data to the data processing subsystem.	SVPCo Image Exchange system network architecture diagram found at http://www.svpco.com/ie_network.pdf shows that the Distributed Traffic Agent operates on a communication network which employs the networking protocol TCP/IP. Images are transferred into SVPCo Image Exchange system and then transferred between financial institutions using hypertext transfer

	protocol (HTTP) or file transfer protocol (FTP). The transmission of image is encrypted using internet protocol security (IPSec).

Claim 2

Claim Language	Accused Instrumentality
2. A system as in claim 1 wherein said one or more data access subsystems further comprise at least one scanner for capturing the paper transaction data.	Clients of SVPCo are required to capture their paper transaction data into electronic images to be sent to SVPCo Image Exchange system.

Claim 3

Claim Language	Accused Instrumentality
3. A system as in claim 2 wherein said one or more data access subsystems also capture electronic transactions from credit cards, smart cards and debit cards, signature data or biometric data, further comprising:	SVPCo Image Exchange system would require that clients capture electronic transactions. Financial institutions would need to have a system that captures electronic transactions to transfer to SVPCo Image Exchange system.
at least one card interface for capturing the electronic transaction data;	Financial institutions would have a system that captures electronic transactions to transfer to SVPCo Image Exchange system.
at least one signature interface for capturing an electronic signature; and	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
at least one biometric interface for capturing biometric data.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 4

Claim Language	Accused Instrumentality
4. A system as in claim 3 wherein said at least one data access controller successively transforms the captured transaction data to a bitmap image, a compressed bitmap image, an encrypted, compressed bitmap image and an encrypted, compressed bitmap image tagged with information identifying a location and time of the	Industry standards would dictate that images are in bitmap format. Further discovery will show that the images are encrypted ,compressed bitmap images and an encrypted, compressed bitmap images tagged

transaction data capture.	with information with identification.

Claim 5

Claim Language	Accused Instrumentality
5. A system as in claim 4 wherein said one or more data access subsystems further comprise digital storage for storing the tagged, encrypted, compressed bitmap image.	SVPCo Image Exchange system receives, stores, and transfers bitmap images transferred by clients.

Claim 6

Claim Language	Accused Instrumentality
6. A system as in claim 5 wherein said at least one card interface initiates the electronic transaction.	SVPCo Image Exchange system receives transmission of images which is initiated by the client's system.

Claim 7

Claim Language	Accused Instrumentality
7. A system as in claim 6 wherein said one or more data access subsystems further comprise at least one printer for printing the paper transaction initiated by said at least one card interface.	The press release dated 09/29/2004 found on http://www.vectorsig.com/Media/vectorsig09292004.asp claims to have the capability to execute reports of summary information. In addition, SVPCo Image Exchange system supports IRD printing.

Claim 8

Claim Language	Accused Instrumentality
8. A system as in claim 7 wherein the paper transaction printed by said at least one printer includes data glyphs.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 9

Claim Language	Accused Instrumentality
9. A system as in claim 1 wherein said data management subsystem of said at least one data processing subsystem comprises:	SVPCo Image Exchange System
at least one server for polling said one or more remote data access subsystems for transaction data;	More than one server is diagrammed in the SVPCo Image Exchange system network architecture diagram found at http://www.svpco.com/ie_network.pdf. MQSeries, which is a component of the network architecture, polls for transmittal and notification messages of transaction data.

a database subsystem for storing the transaction data in a useful form;	Deduction can be made and further discovery will show that at least one database is present and essential to store transaction data in a useful form. Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
a report generator for generating reports from the transaction data and providing data to software applications;	The press release dated 09/29/2004 found on http://www.vectorsig.com/Media /vectorsig09292004.asp claims to have the capability to execute reports of summary information. In addition, SVPCo Image Exchange system supports IRD printing. SVPCo Image Exchange system allows for web-enabled management tool for reporting and tracking.
at least one central processing unit for managing the storing of the transaction data;	Deduction can be made and further discovery will show that SVPCo Image Exchange system comprise of at least one central processing unit for managing the storing of transaction data. Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
a domain name services program for dynamically assigning one of said at least one server to receive portions of the transaction data for balancing the transaction data among said at least one server; and	SVPCo Image Exchange system contains a network comprising of web servers and since a large number of images are accessed through the Checkview web server by many banking institutions, deduction can be made that there are domain name services program to assign transaction data across other servers for purpose of load balancing. Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

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| a memory hierarchy. | Deduction can be made and further discovery will show that SVPCo Image Exchange system has memory hierarchy to facilitate efficient execution of transaction data.

Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions. |

Claim 10

Claim Language	Accused Instrumentality
10. A system as in claim 9 wherein said at least one server also polls for biometric and signature data, said database stores the biometric data and the signature data, and said at least one central processing unit verifies the biometric data and the signature data.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 11

Claim Language	Accused Instrumentality
11. A system as in claim 9 wherein said memory hierarchy comprises at least one primary memory for storage of recently accessed transaction data and at least one secondary memory for storage of other transaction data.	Deduction can be made and further discovery will show infringement of this claim. Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 12

Claim Language	Accused Instrumentality
12. A system as in claim 11 wherein said at least one secondary memory comprises at least one write once read many jukebox and at least one optical storage jukebox.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 13

Claim Language	Accused Instrumentality
13. A system as in claim 12 wherein said at least one optical storage jukebox comprises read only memory technology including compact disc read only memory	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement

| form factor metallic write once read many disc. | Contentions if necessary and certainly during completion of its Final Infringement Contentions. |

Claim 14

Claim Language	Accused Instrumentality
14. A system as in claim 9 wherein said database subsystem comprises at least one predefined template for partitioning the stored transaction data into panels and identifying locations of the panels.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 15

Claim Language	Accused Instrumentality
15. A system as in claim 14 wherein said data processing subsystem further comprises a data entry gateway for correcting errors in the panels of stored transaction data.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 16

Claim Language	Accused Instrumentality
16. A system as in claim 1 wherein said at least one communication network comprises:	SVPCo Image Exchange system.
at least one first local area network for transmitting data within a corresponding one of said one or more remote data access subsystems;	SVPCo Image Exchange system network architecture diagram found at http://www.svpco.com/ie_network.pdf shows a private network transferring images to banking institution networks through DTA.
at least one second local area network for transmitting data within a corresponding one of said at least one data processing subsystem; and	SVPCo Image Exchange system network architecture diagram found at http://www.svpco.com/ie_network.pdf shows a Checkview web server which transmits images between SVPCo private network and banking institution networks.
at least one wide area network for transmitting data between said one or more remote data access subsystems and said at least one data processing subsystem.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 17

Claim Language	Accused Instrumentality
17. A system as in claim 16 wherein said at least one communication network further comprises:	SVPCo Image Exchange System.
at least one modem for connecting said at least one first local area network of said one or more data access subsystems to a corresponding one of said at least one second local area network of said at least one data processing subsystem through said at least one wide area network; and	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
at least one bank of modems for connecting said at least one second local area network of said at least one data processing subsystem to a corresponding some of said at least one first local area network of said one or more data access subsystems through said at least one wide area network.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 18

Claim Language	Accused Instrumentality
18. A system as in claim 1 further comprising at least one data collecting subsystem for collecting and sending the electronic or paper transaction data comprising a further management subsystem for managing the collecting and sending of the transaction data.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 19

Claim Language	Accused Instrumentality
19. A system as in claim 18 wherein said further data management subsystem of said at least one data collecting subsystem comprises:	SVPCo Image Exchange system
at least one server for polling said one or more remote data access subsystems for transaction data;	The SVPCo Image Exchange system network architecture diagram found at http://www.svpco.com/ie_network.pdf. MQSeries, which is a component of the network architecture, polls for transmittal and notification messages of transaction data.
a database for storing the transaction data in a useful form;	The article titled "Image Is Everything" published by Network World on 09/01/03 written by Peter Ruber states that the distributed traffic agent (DTC) server uses Microsoft's database management system SQL Server.

at least one central processing unit for managing the collecting of the transaction data;	Transaction data from financial institution is transferred to, collected, and managed by the SVPCo Image Exchange system.
a domain name services program for dynamically assigning one of said at least one server to receive portions of the transaction data for balancing the transaction data among said at least one server; and	SVPCo Image Exchange system network architecture diagram found at http://www.svpco.com/ie_network.pdf shows a web server by which a customer access via the internet using a web browser. Since there exist at least one web server, deduction can be made that a domain name services (DNS) program is used in the network; and due to the vast amounts of images that are transferred to and from the SVPCo Image Exchange system, a DNS program is needed to assign designation of network traffic for load balancing purposes. Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
a memory hierarchy.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 20

Claim Language	Accused Instrumentality
20. A system as in claim 19 wherein said memory hierarchy comprises at least one primary memory for collecting transaction data and at least one secondary memory for backup storage of the transaction data.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 21

Claim Language	Accused Instrumentality
21. A system as in claim 20 wherein said at least one secondary memory comprises at least one DLT jukebox.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 22

Claim Language	Accused Instrumentality
22. A system as in claim 18 wherein said at least one communication network comprises:	SVPCo Image Exchange system.
at least one first local area network for transmitting data within a corresponding one of said one or more remote data access subsystems;	SVPCo Image Exchange system private network transfer images to the networks of remote banks that requests images.
at least one second local area network for transmitting data within a corresponding one of said at least one data collection subsystem;	Deduction can be made that SVPCo Image Exchange system contains at least one second local area network for transmitting data within a corresponding one of said at least one data collection subsystem. Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
at least one third local area network for transmitting data within a corresponding one of said at least one data processing subsystem; and	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
at least one wide area network for transmitting data between said one or more remote data access subsystems, said at least one data collection subsystem and said at least one data processing subsystem.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 23

Claim Language	Accused Instrumentality
23. A system as in claim 22 wherein said at least one communication network further comprises:	
at least one first modem for connecting said at least one first local area network of said one or more data access subsystems to a corresponding one of said at least one second local area network through said at least one wide area network;	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

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at least one bank of modems for connecting said at least one second local area network of said at least one data collection subsystem to a corresponding some of said at least one first local area network of said one or more data access subsystems through said at least one wide area network;	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
at least one first wide area network router for connecting a corresponding one of said at least one second local area network of said at least one data collecting subsystem to said at least one wide area network; and	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
at least one second wide area network router for connecting a corresponding one of said at least one third local area network of said at least one data processing subsystem to said at least one wide area network.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 24

Claim Language	Accused Instrumentality
24. A system as in claim 23 wherein said at least one first wide area network and said at least one second wide area network comprises a carrier cloud, said carrier cloud using a frame relay method for transmitting the transaction data.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 25

Claim Language	Accused Instrumentality
25. A system as in claim 22 wherein said at least one second local area network and said at least one third local area network further comprises a corresponding one of at least one network switch for routing transaction data within said at least one second local area network and said at least one third local area network.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 26

Claim Language	Accused Instrumentality
26. A method for central management, storage and verification of remotely captured paper transactions from checks comprising the steps of:	SVPCo Image Exchange system.

capturing an image of the paper transaction data at one or more remote locations said transaction data including a payer bank's identification number, a payer bank's routing number, a payer bank's routing information, a payer's account number, a payer's check, a payer bank's draft, a check amount, a payee bank's identification number, a payee bank's routing information, and a payee's account number; and sending a captured image of the paper transaction data;	Clients of SVPCo are required to capture their paper transaction data into electronic images to be sent to SVPCo Image Exchange system. The key component of SVPCo Image Exchange system is the Distributed Traffic Agent (DTA) The document titled "Agent for Change" by Karl Pezirtz published on January 2004 found on the website http://www.bankersonline.com/ vendor_guru/vector/vector_agent.html states- "The DTA is particularly well-suited to banks that have already implemented image capture…" Clients of SVPCo are required to capture their paper transaction data into electronic images to be sent to SVPCo Image Exchange system. SVPCo Image Exchange system receives the transaction data from clients.
managing the capturing and sending of the transaction data;	Clients of SVPCo are required to capture their paper transaction data into electronic images to be sent to SVPCo Image Exchange system. SVPCo Image Exchange system receives the transaction data from clients.
collecting, processing, sending and storing the transaction data at a central location;	SVPCo Image Exchange system network architecture diagram found at http://www.svpco.com/ie_network.pdf shows that there exist a central location for: 1)Collecting: The MQSeries, a component of the SVPCo Image Exchange system collects images by "pulling" image payloads into the system. 2)Processing: Stated in the diagram. 3)Sending: Images are being sent to and from the SVPCo Image Exchange system. Images that are sent requires verification of all the information about all the files sent from one bank to another which allows any bank to access the system to check the status of files they have sent or files sent to them. This is one of the functions of SVPCo's Distributed Traffic Agent (DAT). This reference can be found at http://www.bankersonline.com/vendor_guru/ vector/vector_cmp021604a.html

managing the collecting, processing, sending and storing of the transaction data;	In essence, the DTA is a specialized local controller that acts as a gateway between nodes on the interbank exchange network managed by Electronic Clearing Services (ECS), the SVPCo operating subsidiary that runs the ECP and image systems
encrypting subsystem identification information and the transaction data; and	The network architecture diagram found at http://www.svpco.com/ie_network.pdf states that Internet Protocol Security (IPSec) is used to encrypt transactions.
transmitting the transaction data and the subsystem identification information within and between the remote location(s) and the central location.	SVPCo Image Exchange system network architecture diagram found at http://www.svpco.com/ie_network.pdf shows that transaction data in form of transmission messages are push and pulled using the MQSeries component of the system architecture.

Claim 27

Claim Language	Accused Instrumentality
27. The method as in claim 26 wherein said managing the capturing and sending step comprises the steps of:	SVPCo Image Exchange system.
successively transforming the captured transaction data to a bitmap image, a compressed bitmap image, an encrypted, compressed bitmap image and an encrypted, compressed bitmap image tagged with information identifying a location and time of the transaction data capturing; and	Industry standards would dictate that captured transaction data is transformed to bitmap images in the scanning process.
storing the tagged, encrypted, compressed bitmap image.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 28

Claim Language	Accused Instrumentality
28. The method as in claim 27 wherein said managing the capturing and sending step also captures electronic transactions from credit cards, smart cards and debit cards, signature data or biometric data, further comprising the steps of:	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
initiating an electronic transaction;	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

capturing signature data;	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
capturing biometric data; and	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
printing a paper transaction with data glyphs for the initiated electronic transaction.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 29

Claim Language	Accused Instrumentality
29. A method as in claim 26 wherein:	
said capturing and sending step occurs at a plurality of remote locations; and	SVPCo Image Exchange system main function is to capture and send images to remote financial branches.
said collecting, processing, sending and storing step occurs at a plurality of central locations.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 30

Claim Language	Accused Instrumentality
30. A method as in claim 29 wherein said collecting, processing, sending and storing step comprises the steps of:	
polling the remote locations for transaction data with servers at the central locations;	The SVPCo Image Exchange system network architecture diagram found at http://www.svpco.com/ie_network.pdf. MQSeries, which is a component of the network architecture, polls for transmittal and notification messages of transaction data.
storing the transaction data at the central location in a memory hierarchy, said storing maintains recently accessed transaction data in a primary memory and other transaction data in a secondary memory; and	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

| dynamically assigning the servers at the central location to receive portions of the transaction data for balancing the transaction data among the servers; and | Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions. |
| generating reports from the transaction data and providing data to software applications. | Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions. |

Claim 31

Claim Language	Accused Instrumentality
31. A method as in claim 30 wherein said storing the transaction data step comprises the steps of:	
partitioning the stored transaction data with predefined templates into panels; and	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
identifying locations of the panels.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 32

Claim Language	Accused Instrumentality
32. A method as in claim 31 wherein said managing the collecting, processing, sending and storing of the transaction data step comprises correcting errors in the panels of stored transaction data.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 33

Claim Language	Accused Instrumentality
33. A method as in claim 32 further comprising the steps of:	
polling the remote locations for captured electronic data, captured signature data and captured biometric data with servers at the central locations; and	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

| comparing the captured signature data and the captured biometric data to stored signature data and stored biometric data respectively for identification verification. | Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions. |

Claim 34

Claim Language	Accused Instrumentality
34. A method as in claim 32 wherein said transmitting the transaction data step comprises the steps of:	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
transmitting data within the remote locations;	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
transmitting data from each remote location to a corresponding central location; and	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
transmitting data within the central locations.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 35

Claim Language	Accused Instrumentality
35. A method as in claim 34 wherein said transmitting data from each remote location to a corresponding central location step comprises the steps of:	
connecting each remote location to a corresponding central location; and	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
connecting each central location to corresponding remote locations.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

Claim 36	
Claim Language	**Accused Instrumentality**
36. A method as in claim 29 further comprising the steps of:	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
collecting and sending the electronic or paper transaction data at intermediate locations;	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
managing the collecting and sending of the transaction data; and	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
transmitting the transaction data within the intermediate location and between the intermediate locations and the remote locations and the central locations.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
Claim 37	
Claim Language	**Accused Instrumentality**
37. A method as in claim 36 wherein said managing the collecting and sending step comprises the steps of:	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
polling the remote locations for transaction data with servers in the intermediate locations;	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
storing the transaction data in the intermediate locations in a useful form, said storing maintains the transaction data in a primary memory of a memory hierarchy and performs backup storage of the transaction data into a secondary memory of the memory hierarchy; and	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.

dynamically assigning the servers to receive portions of the transaction data for balancing the transaction data among the servers.	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
Claim 38	

Claim Language	**Accused Instrumentality**
38. The method as in claim 36 wherein said transmitting the transaction data step comprises the steps of:	
transmitting data within the remote locations;	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
transmitting data from each remote location to a corresponding intermediate location;	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
transmitting data within the intermediate locations;	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
transmitting data from each intermediate location to corresponding central locations; and	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
transmitting data within the central locations	Formal discovery is necessary to determine if SVPCo infringes this claim. DataTreasury will amend this aspect of its Preliminary Infringement Contentions if necessary and certainly during completion of its Final Infringement Contentions.
Claim 39	

Claim Language	**Accused Instrumentality**
39. A method as in claim 38 wherein said transmitting data from each remote location to corresponding intermediate locations step comprises the steps of:	
connecting each remote location to a corresponding intermediate location; and	DataTreasury currently does not have enough information to show infringement. Infringement

	will be show through discovery.
connecting the intermediate locations to corresponding remote locations.	DataTreasury currently does not have enough information to show infringement. Infringement will be show through discovery.

Claim 40

Claim Language	Accused Instrumentality
40. A method as in claim 38 wherein said transmitting data from each intermediate location to corresponding central locations comprises the steps of:	
connecting each intermediate location to an external communication network; and	DataTreasury currently does not have enough information to show infringement. Infringement will be show through discovery.
connecting the corresponding central locations to the communication network.	DataTreasury currently does not have enough information to show infringement. Infringement will be show through discovery.

Claim 41

Claim Language	Accused Instrumentality
41. A method as in claim 40 wherein said transmitting data from each intermediate location to corresponding central locations step further comprises the steps of:	
packaging the transaction data into frames; and	DataTreasury currently does not have enough information to show infringement. Infringement will be show through discovery.
transmitting the frames through the external communication network.	DataTreasury currently does not have enough information to show infringement. Infringement will be show through discovery.

Claim 42

Claim Language	Accused Instrumentality
42. A system for central management, storage and report generation of remotely captured paper transactions from checks comprising:	SVPCo Image Exchange
one or more remote data access subsystems for capturing and sending paper transaction data and verifying transaction data from the checks comprising at least one imaging subsystem for capturing the checks and at least one data access controller for managing the capturing and sending of the transaction data;	Clients of SVPCo are required to capture their paper transaction data into electronic images to be sent to SVPCo Image Exchange system. The document titled "Agent for Change" by Karl Pezirtz published on January 2004 found on the website http://www.bankersonline.com/ vendor_guru/vector/vector_agent.html states- "The DTA is particularly well-suited to banks

	that have already implemented image capture and back office systems" The document titled "SVPCo's Distributed Traffic Agent" by Karl Pezirtz first published on 02/16/04 on the website http://www.bankersonline.com/vendor_guru/vector/vector_cmp021604a.html states-"For banks that aren't quite as far along in image capabilities, VECTORsgi can supply any necessary software for the creation and receipt of image exchange files."
at least one central data processing subsystem for processing, sending, verifying and storing the paper transaction data and the subsystem identification information comprising a management subsystem for managing the processing, sending and storing of the of the transaction data; and	SVPCo Image Exchange network as diagrammed or mentioned in the following articles found at http://www.svpco.com/ie_network.pdf, http://www.bai.org/check21/pdf/Farrar-Kline.pdf, and http://www.bankersonline.com/vendor_guru/vector/vector_cmp021604a.html shows that there must exist a central data processing subsystem for the following elements: 1)Processing: this is stated in the diagrams 2)Sending: Images are being sent to and from the SVPCo Image Exchange system. 3)Verifying: Images that are sent requires verification of all the information about all the files sent from one bank to another which allows any bank to access the system to check the status of files they have sent or files sent to them. This is one of the functions of SVPCo's Distributed Traffic Agent (DTA). 4) Storing of the transaction data- SVPCo has all the information about all the files sent from one bank to another, any bank can access the system to check the status of files they have sent or files sent to them. In addition, transaction data must exist since it is claimed in the article that banks can use the DTA for network communications, authentication, file tracking and audit controls. In essence, the DTA is a specialized local controller that acts as a gateway between nodes on the interbank exchange network managed by

	Electronic Clearing Services (ECS), the SVPCo operating subsidiary that runs the ECP and image systems
at least one communication network for the transmission of the transaction data within and between said one or more data access subsystems and said at least one data processing subsystem, with the data access subsystem providing encrypted subsystem identification information and encrypted paper transaction data to the data processing subsystem.	SVPCo Image Exchange system network architecture diagram found at http://www.svpco.com/ie_network.pdf shows that the Distributed Traffic Agent operates on a communication network which employs the networking protocol TCP/IP. Images are transferred into SVPCo Image Exchange system and then transferred between financial institutions using hypertext transfer protocol (HTTP) or file transfer protocol (FTP). The transmission of image is encrypted using internet protocol security (IPSec).

Claim 43

Claim Language	Accused Instrumentality
43. A method for central management, storage and verification of remotely captured paper transactions from checks comprising the steps of:	SVPCo Image Exchange system.
capturing an image of the check at one or more remote locations and sending a captured image of the check;	Clients of SVPCo are required to capture their paper transaction data into electronic images to be sent to SVPCo Image Exchange system. The key component of SVPCo Image Exchange system is the Distributed Traffic Agent (DTA) The document titled "Agent for Change" by Karl Pezirtz published on January 2004 found on the website http://www.bankersonline.com/vendor_guru/vector/vector_agent.html states- "The DTA is particularly well-suited to banks that have already implemented image capture…" Clients of SVPCo are required to capture their paper transaction data into electronic images to be sent to SVPCo Image Exchange system. SVPCo Image Exchange system receives the transaction data from clients.
managing the capturing and sending of the transaction data;	Clients of SVPCo are required to capture their paper transaction data into electronic images to be

	sent to SVPCo Image Exchange system. SVPCo Image Exchange system receives the transaction data from clients.
collecting, processing, sending and storing the transaction data at a central location;	SVPCo Image Exchange system network architecture diagram found at http://www.svpco.com/ie_network.pdf shows that there exist a central location for: 1)Collecting: The MQSeries, a component of the SVPCo Image Exchange system collects images by "pulling" image payloads into the system. 2)Processing: Stated in the diagram. 3)Sending: Images are being sent to and from the SVPCo Image Exchange system. Images that are sent requires verification of all the information about all the files sent from one bank to another which allows any bank to access the system to check the status of files they have sent or files sent to them. This is one of the functions of SVPCo's Distributed Traffic Agent (DAT). This reference can be found at http://www.bankersonline.com/vendor_guru/ vector/vector_cmp021604a.html.
managing the collecting, processing, sending and storing of the transaction data;	In essence, the DTA is a specialized local controller that acts as a gateway between nodes on the interbank exchange network managed by Electronic Clearing Services (ECS), the SVPCo operating subsidiary that runs the ECP and image systems.
encrypting subsystem identification information and the transaction data;	The network architecture diagram found at http://www.svpco.com/ie_network.pdf states that Internet Protocol Security (IPSec) is used to encrypt transactions.
verifying the transaction data from the check; and	The network architecture diagram found at http://www.svpco.com/ie_network.pdf shows transmittal and notification messages are communicated to ensure transaction completes successfully.
transmitting the transaction data and the subsystem identification information within and between the remote location(s) and the central location.	SVPCo Image Exchange system network architecture diagram found at http://www.svpco.com/ie_network.pdf shows that transaction data in form of transmission messages are push and pulled using the MQSeries component of the system architecture.

Plaintiff reserves the right to unilaterally modify and supplement, without prejudice, its Preliminary Infringement Contentions.

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CERTIFICATE OF SERVICE

A true and correct copy of the above and foregoing document has been served electronically on all counsel of record for SVPCo on this 10th day of April, 2005:

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